

# United States District Court

for the  
Western District of New York

United States of America

v.

Case No. 20-mj-1048  
(Filed Under Seal)

MICHAEL McDONALD  
a/k/a Rabbit  
a/k/a George Jackson

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Between in or about January 2017 and in or about December 2018, in the County of Erie, in the Western District of New York and elsewhere, the defendant, **MICHAEL MCDONALD a/k/a Rabbit a/k/a George Jackson**, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, and maintain by any means, in and affecting interstate and foreign commerce, persons, that is, Victims 1, 2, and 3, and did benefit financially and by receiving anything of value from participation in a venture which has engaged in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, and any combination of such means, would be used to cause Victims 1, 2 and 3 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a), 1591(b)(1) and 2.

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

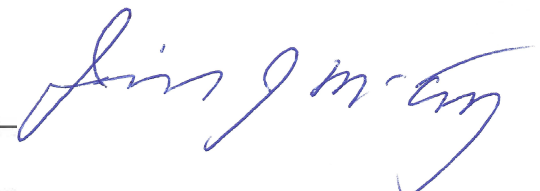
  
Complainant's signature

TINA M. TAYLOR  
SPECIAL AGENT  
FEDERAL BUREAU OF INVESTIGATION  
Printed name and title

Sworn to before me and signed telephonically.

Date: June 3, 2020

City and State: Buffalo, New York

  
HONORABLE JEREMIAH J. MCCARTHY  
UNITED STATES MAGISTRATE JUDGE  
Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

STATE OF NEW YORK    )  
COUNTY OF ERIE        )    SS:  
CITY OF BUFFALO        )

TINA M. TAYLOR, being duly sworn, deposes and states:

1. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI") assigned to the Buffalo, NY Field Office. I have been employed as a SA of the FBI for approximately twenty-one years. I am currently assigned to investigate Civil Rights violations and Human Trafficking, including Sex Trafficking of Children and by Force, Fraud and/or Coercion in violation of Title 18, United States Code, Section 1591 and Coercion and Enticement in violation of Title 18, United States Code, Section 2422.

2. The facts in this Affidavit are based upon my personal observations, my training and experience, information provided by Victims, Witnesses and other law enforcement personnel and information obtained from Facebook search warrants.

3. Based upon my training and experience and the facts set forth in this affidavit, there is probable cause to believe that MICHAEL MCDONALD, also known as (A/K/A) "GEORGE JACKSON," A/K/A "RABBIT," violated 18 U.S.C., Section 1591(a) and 1591(b)(1) (Sex Trafficking).

4. The relevant statutory language for the purposes of this affidavit, 18 U.S.C., Section 1591, states, in relevant part:

(a) Whoever knowingly-

(1) In or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, recruits, entices, harbors, transports, provides, or obtains by any means a person; or

(2) Benefits financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1), knowing, or in reckless disregard of the fact that means of force, threats of force, fraud, coercion described in subsection (e)(2), or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall be punished as provided in subsection (b).

#### PROBABLE CAUSE

6. In or about October, 2017, the FBI began an investigation targeting MICHAEL MCDONALD, A/K/A "GEORGE JACKSON" A/K/A "RABBIT," for operating an illegal sex buying scheme by employing fraud, force and/or coercion based upon information provided by an individual who was victimized by MCDONALD (hereinafter referred to as "VICTIM 1").

#### VICTIM 1

7. On October 12, 2017, the Cheektowaga Police Department ("CPD") conducted a prostitution sting operation wherein VICTIM 1 was arrested and interviewed by your affiant and another FBI Agent. I also interviewed VICTIM 1 on two other occasions, October 20, 2017 and January 23, 2018.



8. VICTIM 1 stated that she worked for a pimp named MICHAEL MCDONALD, A/K/A "GEORGE JACKSON" A/K/A "RABBIT," from in or about January, 2017 to in or about May, 2017. In the context of the crime of sex trafficking, a pimp is a person who controls vulnerable people and coordinates with sex buyers to pay for sex with the vulnerable person in exchange for money—taking part or all of the earnings in return. Pimp is glorified term for a person who engages in illegal, for-profit, sex-selling activity by exploiting vulnerable people and profiting from their exploitation. Based on my knowledge, training and experience, pimps target vulnerable, sometimes desperate, people, including, but not limited to, drug addicts, sexual assault victims, victims of domestic violence, indigents, homeless populations, people with physical, mental, and emotional disabilities, and children. Based on my experience, the police and others in authority, are less likely to believe these vulnerable victim if they come forward to report their exploitation for a variety of reasons including the length of time the victim stayed with the trafficker and a lack of understanding as to why the victim simply did not walk away from the trafficker.

9. With this in mind, MCDONALD recruited VICTIM 1 to work for him using Facebook messenger under the Facebook name "George Jackson," profile identification Buffinesttv.buffalo. To entice VICTIM 1 to work for him, MCDONALD told her that he only wanted her to "dance" and "strip" at a Club in Florida and that she could make a lot of money. MCDONALD specifically told VICTIM 1 that she would not have to engage in prostitution.

10. Prior to traveling to Florida, VICTIM 1 and MCDONALD reached a verbal agreement that VICTIM 1 would allow MCDONALD to drive her truck to Florida and that VICTIM 1 would fly down to Florida at a later date and meet him in Florida. VICTIM 1 and MCDONALD also agreed that she would work as a stripper/dancer for a couple of days in Florida and then VICTIM 1 would be able to drive her truck back to Buffalo. MCDONALD told VICTIM 1 that she could keep all the money she made from “dancing” and “stripping” at the clubs in Florida and that his payment for arranging the jobs at the clubs for VICTIM 1 was VICTIM 1 allowing him to use her truck to drive to Florida. MCDONALD told VICTIM 1 that she could make up to \$2,000 a night working at the strip clubs in Florida.

11. On or about February 3, 2017, VICTIM 1 flew to Orlando, Florida and began dancing at strip clubs which MCDONALD arranged. VICTIM 1 made approximately \$6,000.00 dancing and stripping at the clubs in Florida. VICTIM 1 planned to leave Florida on or about February 7, 2017 with the money she earned from dancing as originally agreed upon. When VICTIM 1 tried to leave MCDONALD and drive her truck back to Buffalo, NY, MCDONALD manually strangled her, lifting her off the floor and then slammed her down on the floor. MCDONALD then took the \$6,000 VICTIM 1 earned, as well as her debit card and her driver’s license, stating “bitch you ain’t going nowhere!” MCDONALD then provided VICTIM 1 with a bottle of water which contained the drug “Molly” and raped her. After MCDONALD raped VICTIM 1 and took all of her money and identifying documents, he forced VICTIM 1 to engage in prostitution, both in Buffalo and in Florida. VICTIM 1 was afraid of MCDONALD and continued to engage in sex acts for MCDONALD out of fear. MCDONALD assaulted VICTIM 1 on numerous occasions

because she did not want her to engage in prostitution by hitting, stomping and pulling her hair. MCDONALD knew where VICTIM 1's aunt and mother lived and threatened to harm VICTIM 1's family if she did not engage in commercial sex for MCDONALD.

12. VICTIM 1 escaped from MCDONALD in or about June, 2017 when she ran out of a hotel in Buffalo after MCDONALD beat her and broke a phone by slamming it into her face.

### VICTIM 2

13. On January 12, 2018, the Plantation Police Department (PPD) in Plantation Florida responded to a house located at 4856 NW 9<sup>th</sup> Drive, Plantation, Florida after receiving a 911 call that an individual was being held against her will at the location (hereinafter referred to as "VICTIM 2"). VICTIM 2 was rescued from the house and interviewed by an Officer from the PPD. I reviewed the "Incident/Investigation Report" prepared by that Officer. According to the report, VICTIM 2 told the Officer that she met MCDONALD in New York where he offered to take her on vacation to south Florida. On or about January 12, 2018, MCDONALD and VICTIM 2 flew from New York to Orlando, Florida. Once in Orlando, MCDONALD rented a vehicle and drove VICTIM 2 to Plantation, Florida. After VICTIM 2 arrived in Orlando, she noticed that the plane ticket MCDONALD purchased was a one-way ticket. VICTIM 2 confronted MCDONALD about the ticket and MCDONALD became "confrontational" and "abusive" toward VICTIM 2. On the drive from Orlando to Plantation, MCDONALD stopped at an unknown residence, possibly in Winter Haven, Florida, and sexually assaulted VICTIM 2 by forcing her to have sex with him. VICTIM 2



also stated that MCDONALD was intending on forcing her to attend a "boat party" where he would have her strip and perform sexual acts for money against her will. MCDONALD told Victim 2 that no one could know her true identity and provided her with a false identification document and a ticket needed to board the boat. MCDONALD instructed VICTIM 2 that she was not allowed to bring her phone onto the boat because he did not want her to be tracked. Once VICTIM 2 learned this, she attempted to leave the house, but MCDONALD stopped her and threatened to beat her if she attempted to leave again.

14. After VICTIM 2 was interviewed, she was taken to the Nancy J. Cotterman Center, a Sexual Assault Treatment Center (SATC), in Ft. Lauderdale, FL for medical testing (rape kit). Then, VICTIM 2 was transported to Delray Beach Police Department where she was taken to the Aid to Victims of Domestic Abuse Shelter, a shelter that cares for victims of domestic violence.

15. On January 14, 2018, VICTIM 2 was interviewed at the SATC by a Detective from the PPD and on October 22, 2018, I interviewed VICTIM 2 at the Niagara County Jail in Niagara Falls, NY. During those interviews, VICTIM 2 stated that in 2017, she worked at a nightclub in Buffalo, NY named Scores with a female nicknamed "Treasure." "Treasure" is the sister of MCDONALD. In January of 2018, MCDONALD told VICTIM 2 that he had an extra ticket to Florida and invited VICTIM 2 to travel with him on vacation. MCDONALD made VICTIM 2 prostitute twice in Buffalo prior to going to Florida to earn money to spend in Florida. VICTIM 2 had sex with two clients in exchange for \$700. MCDONALD made VICTIM 2 give him the entire \$700.

16. In or about January, 2018, MCDONALD caused Victim 2 to fly from Buffalo, NY to Orlando, FL for the purposes of engaging in prostitution. In order to ensure that VICTIM 2 would travel to Florida with him, MCDONALD lied to VICTIM 2 and told her that she was merely going to Florida for a vacation and that he purchased her a round trip ticket so that she would be able to return to Buffalo. When VICTIM 2 arrived in Florida, she realized that MCDONALD purchased her a one way ticket.

17. After they arrived in Florida, MCDONALD rented a vehicle and drove to a house located in a town in Florida possibly starting with the word "Winter," so MCDONALD could purchase weed. At the house, MCDONALD raped VICTIM 2 by forcing her to have sexual intercourse with him in the bathroom. VICTIM 2 expressly told MCDONALD that she did not want to have sex with him, but MCDONALD physically forced himself on her, stating that she was going to have sex with him anyway.

18. Thereafter, MCDONALD and VICTIM 2 drove to a house in Plantation, Florida and met an individual named Steven Hoskins, aka "Milk" and "Milk Rich,"<sup>1</sup> and his bottom girl<sup>2</sup>. The house belonged to Hoskins' sister. Once they arrived at the house, MCDONALD took VICTIM 2's phone away from her as a means to control her and because he did not want her talking to and/or text messaging other people. MCDONALD hit VICTIM 2 in the arm and attempted to hit VICTIM 2 again when she refused to give him her phone. MCDONALD also forbid Victim 2 from touching the door of the house and told

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<sup>1</sup> Steven Hoskins, aka "Milk" and "Milk Rich" is also a known pimp.

<sup>2</sup> Bottom girl is a term referring to the pimp's main prostitute or girl the pimp trusts to take a leadership role in the pimp's commercial sex business.



VICTIM 2 that if she attempted to touch the door, he would have everybody in the house beat her. MCDONALD also forbid VICTIM 2 from talking to other African American men, including Hoskins.

19. MCDONALD gave VICTIM 2 rules to follow, including that she could not talk to his friends and could not maintain possession of her phone. MCDONALD also took VICTIM 2's phone and went through it telling her that he would smash the phone if she used it to send text messages, thereby isolating VICTIM 2 from her family and friends.

20. MCDONALD told VICTIM 2 that she was going to have to prostitute and steal watches during a party on a boat in Miami, Florida. When VICTIM 2 realized that MCDONALD was going to force her to prostitute on a boat, she used one of the trac phones within the house to text her mother to tell her that she was becoming increasingly uncomfortable with MCDONALD. VICTIM 2 felt uncomfortable because MCDONALD only bought a one way ticket, MCDONALD took her phone away, and MCDONALD was getting "aggressive" with VICTIM 2.

21. VICTIM 2 told MCDONALD that she wanted to leave the house in Plantation, Florida and return to Buffalo, NY. MCDONALD would not allow VICTIM 2 to leave and told her that she owed him a debt, including the cost of the plane ticket and the \$2,000 he lost on the way to Florida. MCDONALD told VICTIM 2 that she was going to have sex with clients for money to pay back that debt.

22. When MCDONALD fell asleep, VICTIM 2 grabbed her phone and text messaged her mom; VICTIM 2's mom then contacted the PPD, who rescued VICTIM 2 from the house. VICTIM 2 exited the house through the back door because MCDONALD told her that the front door was off limits and she felt like he had it booby trapped.

23. After Officers from the PPD rescued VICTIM 2, they took her to the Sexual Assault Treatment Center (SATC) in Ft. Lauderdale, Florida. The staff at the SATC were able to find a shelter specializing in aid to domestic violence victims in Delray Beach, Florida for VICTIM 2.

### VICTIM 3

24. On December 6, 2019, I interviewed another individual who was victimized by MCDONALD (hereinafter referred to as "VICTIM 3"). Paragraphs 24 through 33 are based upon that interview.

25. In or about January, 2017, VICTIM 3 traveled to Brooklyn, NY to audition for a job in the entertainment industry. Another individual who worked as a prostitute for MCDONALD and who VICTIM 3 knew from her teenage years (hereinafter referred to "Witness 1") contacted VICTIM 3 via Snapchat<sup>3</sup> and asked to meet up. MCDONALD, Witness 1, and another individual who worked as a prostitute for MCDONALD (hereinafter referred to as "Witness 2") picked VICTIM 3 up from the apartment she was staying at in Brooklyn and drove her to Buffalo, NY.

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<sup>3</sup> Snapchat is a mobile application and service for sharing photos, videos and messages with other people.

26. When they arrived in Buffalo, NY, MCDONALD took VICTIM 3 and Witness 1 to a hotel approximately thirty minutes outside of Buffalo because he did not trust VICTIM 3 to take her to his house in Buffalo. Initially, MCDONALD lied to VICTIM 3 and told her that he could help her fulfill her dreams of becoming a singer and obtaining custody of her children. MCDONALD told VICTIM 3 that he knew Beyonce and had been to her home in the past. MCDONALD also told VICTIM 3 that she did not have to go anywhere or do anything she did not want to do.

27. The next day, MCDONALD started to break VICTIM 3 down mentally and physically. MCDONALD blind folded VICTIM 3 and had another male rape her at the hotel. After VICTIM 3 was raped, she was in shock and remembered thinking that this is her life now. VICTIM 3 stated that MCDONALD made her feel that all she could do was work as a prostitute for him. MCDONALD repeatedly told her that nobody loved her and that she did not have anyone, other than him, to rely upon. MCDONALD gave VICTIM 3 rules to abide by, such as never looking African American men in the eyes. MCDONALD controlled every aspect of VICTIM 3's life and isolated her from her friends and family. MCDONALD monitored VICTIM 3's phone so that she could not contact family or friends. MCDONALD also made VICTIM 3 aware that he had guns in the house in order to control her and prevent her from leaving.

28. VICTIM 3 worked as a prostitute for MCDONALD for approximately four or five months from in or about January, 2017 to in or about May, 2017. During that four month period, at least four other girls worked as prostitutes for MCDONALD, Witness 1, Witness



2, and two other girls. MCDONALD gave VICTIM 3 a quota of \$1,000 per day and if VICTIM 3 failed to meet that quota, MCDONALD did not let her eat or shower and anally rape her as a form of punishment. MCDONALD often starved VICTIM 3. Sometimes, the only food she had was if a client bought her food. MCDONALD charged clients between \$250 and \$400 per hour, depending on what type of sexual service they desired. VICTIM 3 estimated that she saw performed sexual services for between 8 to 10 clients per day in exchange for money. MCDONALD forced VICTIM 3 to work 24 hours per day, 7 days per week and would not allow her to take any time off. VICTIM 3 earned the most money through prostitution out of any of the girls working for MCDONALD at the time. MCDONALD took all of the money VICTIM 3 earned through prostitution. MCDONALD charged VICTIM 3 for everything he provided to her, such as clothes, saying "do you think this shit is free?"

29. Another manner in which MCDONALD exerted control over VICTIM 3 was by beating her and routinely raping her. The day after MCDONALD had another male rape VICTIM 3, referenced in paragraph 25 of this affidavit, VICTIM 3 and the other girls were hungry. VICTIM 3 took some of the money she earned through prostitution and bought herself and the other girls food. VICTIM 3 also bought MCDONALD an inexpensive speaker, thinking that if she was nice to him, he would not have her raped again. MCDONALD became enraged when he found out VICTIM 3 spent his money and beat VICTIM 3 with a lamp, calling VICTIM 3 a "dumb cunt" and saying that VICTIM 3 was "fucking" with his money. MCDONALD also called VICTIM 3 a "super white bitch," telling her that her parents did not love her, that no one will ever love her, and that she is with

him because she does not have anyone else. MCDONALD told VICTIM 3 that she was his property. MCDONALD made VICTIM 3 perform oral sex on a client to earn the money back that she spent.

30. MCDONALD beat VICTIM 3 and the other girls with lamps, shoes, and heels. He also threw shampoo bottles and chairs at them and choked VICTIM 3 out against a wall. MCDONALD took VICTIM 3 by the hair and smashed her into a chair. VICTIM 3 observed MCDONALD throw Witness 2 down the stairs and heard MCDONALD beating the other girls in various rooms throughout the house. VICTIM 3 recalled one time wherein MCDONALD beat VICTIM 3 because she did not know how to cook fried chicken the way MCDONALD liked it to be cooked.

31. MCDONALD also repeatedly raped VICTIM 3 and would often times rape her in the anus with extreme force, causing her to sustain damage from the tearing of her anus. As a result, VICTIM 3 had to have surgery on her anus to repair the damage from the tearing.

32. VICTIM 3 estimated that she asked MCDONALD at least 30 times to go visit her family in Florida. MCDONALD always told VICTIM 3 that she had to make more money if she wanted to go home. Around Mother's Day weekend in 2017, VICTIM 3 had a mandatory Court date in Florida regarding custody of her daughter. MCDONALD would not allow VICTIM 3 to travel to Florida by herself because he wanted to ensure that VICTIM 3 returned, saying "you're my bitch, I have to go." While they were at the hotel in Florida,

there was a man standing near VICTIM 3's hotel room smoking marijuana. VICTIM 3 glanced at the man to see why he was standing near the door to her hotel room. MCDONALD turned around and punched VICTIM 3 in the nose, fracturing her nose. MCDONALD called VICTIM 3 a "fucking whore," asking VICTIM 3 if she wanted to smoke marijuana with the man. There was more blood than VICTIM 3 had ever seen in her life. MCDONALD then raped VICTIM 3. During the rape, VICTIM 3 starred at the ceiling wishing it was over. There was so much blood on the sheets, MCDONALD made VICTIM 3 tell the maid she had her period.


33. The next day, VICTIM 3 used make-up to try to cover up the beating so that she could go see her Mom. After some convincing, MCDONALD allowed VICTIM 3 to go see her Mom but kept VICTIM 3's phone. When VICTIM 3 saw her Mom, she told her everything. When MCDONALD honked the horn to pick VICTIM 3 up, VICTIM 3's Mom and Step-dad confronted MCDONALD and asked if he wanted them to call the police. MCDONALD drove off. VICTIM 3 reported the incident to the Hillsborough Police Department.

### CONCLUSION

34. Based upon the foregoing, it is respectfully submitted that there is probable cause to believe that MICHAEL MCDONALD, A/K/A "RABBIT" A/K/A "GEORGE JACKSON", violated 18 U.S.C., Section 1591(a) and 1591(b)(1) (Sex Trafficking). It is

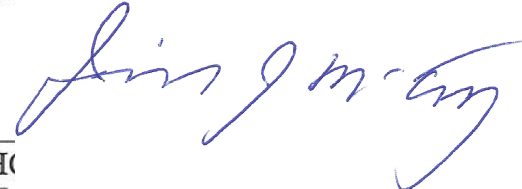


requested that the Criminal Complaint, arrest warrant and this Affidavit be filed under seal to prevent flight of the subject and for law enforcement officer safety.

  
TINA M. TAYLOR  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn before me telephonically

this 3<sup>rd</sup> day of June, 2020

  
HJ  
United States Magistrate Judge